

# **EXHIBIT 1**

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1. Please describe your educational background.
2. Did you found the company Solo Capital Limited (later Solo Capital Partners), which I will refer to collectively as “Solo”?
3. When did you found Solo?
4. Please describe your work history prior to founding Solo, including the place(s) of employment, the position(s) you held, and a description of your job responsibilities.
5. Did you found a charity called Autism Rocks in 2014?
6. If yes, why?
7. In the professional experience you just described, did you engage in international banking and/or trading?
8. If yes, please describe.
9. In your professional experience, did you ever encounter structured dividend arbitrage trades?
10. If yes, please describe.
11. How common was dividend arbitrage trading in your experience?
12. Why did you decide to start your own company, Solo?
13. How many employees did Solo have at its largest point?
14. Can you identify Solo’s employees in 2012, 2013, 2014, and 2015?
15. What qualifications did you look for in hiring employees at Solo?
16. What types of professional backgrounds and qualifications did Solo employees have?
17. Were you involved in recruiting employees to Solo?
18. If yes, how did you recruit these employees?
19. Where were Solo’s offices?
20. What was your job title at Solo?
21. What were your responsibilities at Solo?
22. What types of trading activities did Solo engage in?

23. Did Solo have any professional licenses?
24. Did Solo Capital Limited eventually become Solo Capital Partners LLP?
25. When did this happen?
26. Why did you transition your trading activities from a limited liability company to a partnership?
27. Are you familiar with ex-dividend trading?
28. What is your understanding of how ex-dividend trading works?
29. When did you first learn of ex-dividend trading?
30. How did you learn of it?
31. What types of entities engage in ex-dividend trading, to your understanding?
32. Can you name some entities who in your experience have engaged in ex-dividend trading?
33. In your experience, is ex-dividend trading a generally accepted practice among financial professionals?
34. Did Solo ever engage in ex-dividend trading?
35. If so, when did Solo first engage in ex-dividend trading?
36. What was your understanding of the legality of ex-dividend trading at that time?
37. What was the basis for that understanding?
38. In what financial market or markets did Solo first engage in ex-dividend trading?
39. Who chose this location?
40. What is your understanding of why that location was chosen?
41. Are you familiar with an individual named Rajen Shah?
42. How do you know him?
43. Did Rajen Shah ever work for Solo?
44. If so, what was his position?
45. What was Rajen Shah's professional background?
46. Did you ever discuss with Rajen Shah the possibility of Solo engaging ex-dividend trading?

47. When?
48. What did you discuss?
49. Did you understand the ex-dividend trading strategy you discussed with Rajen Shah to be a legal trading strategy?
50. What was the basis of that understanding?
51. Did you have a role in developing Solo's ex-dividend strategy?
52. If so, what role did you play?
53. Did Solo engage in ex-dividend trading in Denmark?
54. When did this occur?
55. Who chose to engage in ex-dividend trading in Denmark?
56. What is your understanding of the reasons Solo decided to engage in ex-dividend trading in Denmark?
57. Was Solo engaging in ex-dividend trading in any other countries at this time?
58. Did Solo engage in any other type of trading at this time?
59. If yes, what other types of trading?
60. Please explain in detail the structure of Solo's ex-dividend trading strategy in Denmark, including each step of the strategy.
61. What role and responsibilities did you have in organizing or managing Solo's ex-dividend trades of Danish shares?
62. What was your understanding of the legality of Solo's ex-dividend trading strategy in Denmark?
63. What was the basis for this understanding?
64. Did you ever seek advice as to the legality of Solo's ex-dividend trading strategy in Denmark?
65. What advice were you given?
66. Which law firm (or firms) gave you that advice?
67. Were you given written legal opinions that supported Solo's ex-dividend trading strategy and/or its execution of that strategy?

68. If yes, when and from whom?
69. If yes, what did the legal opinions say?
70. What was your purpose in seeking this legal advice?
71. Did you share this advice with anyone else?
72. If so, with whom did you share it?
73. How did Solo locate clients?
74. Did Solo do due diligence on its clients?
75. Are you familiar with a firm called Argre Management?
76. When did Solo first encounter Argre Management?
77. What was Solo's relationship with Argre Management?
78. Who were the persons from Argre Management with whom Solo interacted?
79. Are you familiar with an individual named Richard Markowitz?
80. When did Solo first encounter Mr. Markowitz?
81. What was Solo's relationship with Mr. Markowitz?
82. What did you know or learn about Mr. Markowitz's background?
83. Did he seem to you to be a reputable, financially sophisticated person?
84. Are you familiar with an individual named John van Merkensteijn?
85. When did Solo first encounter Mr. van Merkensteijn?
86. What was Solo's relationship with Mr. van Merkensteijn?
87. What did you know or learn about Mr. Merkensteijn's background?
88. Did he seem to you to be a reputable, financially sophisticated person?
89. Are you familiar with an individual named Jerome Lhote?
90. When did Solo first encounter Mr. Lhote?
91. What was Solo's relationship with Mr. Lhote?
92. What did you know or learn about Mr. Lhote's background?

93. Did he seem to you to be a reputable, financially sophisticated person?
94. Are you familiar with an individual named Matthew Stein?
95. When did Solo first encounter Mr. Stein?
96. What was Solo's relationship with Mr. Stein?
97. What did you know or learn about Mr. Stein's background?
98. Did he seem to you to be a reputable, financially sophisticated person?
99. Are you familiar with an individual named Adam LaRosa?
100. When did Solo first encounter Mr. LaRosa?
101. What was Solo's relationship with Mr. LaRosa?
102. What did you learn about Mr. LaRosa's background?
103. Did he seem to you to be a reputable, financially sophisticated person?
104. Did Messrs. Markowitz, van Merkensteijn, Lhote, Stein, and/or LaRosa (hereinafter referred to collectively as "the Principals") participate in Solo's ex-dividend trading strategy?
105. How did they participate?
106. Did you ever communicate with any of the Principals regarding Solo's ex-dividend trading strategy?
107. If so, describe these communications, including but not limited to the frequency and subject matter of your conversations.
108. Did you ever communicate with any of the Principals regarding the legality of the ex-dividend trades of Danish shares?
109. If so, describe those discussions.
110. What is your understanding as to what the Principals' role was in the ex-dividend arbitrage trading strategy?
111. Did you ever tell the Principals the identity of the counterparties with whom they transacted?
112. Did you ever tell them that the trading that led to the tax refund claims was circular, or a closed loop?

113. Did Solo's clients include United States-based pension plans that purchased Danish shares?
114. Did you have an understanding of the role of these pension plans in the ex-dividend trading strategy?
115. How did the idea to use pension plans to execute trades originate?
116. Did you have any involvement in setting up pension plans for Solo's clients, including but not limited to the Principals?
117. Did there come a time when one or more of the Principals visited Solo's office in London?
118. Which of the Principals visited Solo's office in London?
119. What was your understanding of the purpose of that visit?
120. Do you know someone named Michael Ben-Jacob?
121. Who is he?
122. Have you ever met him?
123. Have you ever spoken to him?
124. On how many occasions?
125. What did you and he discuss?
126. Have you communicated with him by email, or text?
127. If so, how many times?
128. What did you and he communicate about?
129. Was Solo regulated by the FCA?
130. What was your understanding of what it meant to be an FCA-regulated entity?
131. What was your understanding of the frequency or intensity of regulatory oversight into FCA-regulated entities?
132. What was your understanding of whether it was a legal requirement for actual shares to change hands in order for an entity to have beneficial ownership of the shares for purposes of dividend tax assessment in Denmark?

133. What did you base this understanding on?
134. Did you ever communicate that understanding to the Principals?
135. At the time Solo was engaged in ex-dividend trading in Denmark, were you aware of others that were also engaged in ex-dividend trading in Denmark?
136. It has been suggested that the trading that led to the tax refund claims was a circular, closed system in which nothing came in from outside; do you agree or disagree with that statement?
137. Please explain the basis for your response.
138. Regardless of whether dividends “came from outside,” to your understanding, was there still a basis for the purchaser of the Danish shares to be entitled to dividends based on the trade?
139. Please explain the basis for your response.
140. When were you first made aware of allegations that Solo’s ex-dividend trading strategy was fraudulent?
141. How were you made aware of those allegations?
142. What is your reaction to being accused by the Danish Customs and Tax Administration of fraud?
143. Had any criminal or financial complaints previously been filed against you or Solo by anyone?
144. Do you believe that you did anything illegal or fraudulent in executing the ex-dividend trading strategy in Denmark?
145. Why or why not?
146. Would you have devised or participated in the trading strategy if you believed it was illegal or fraudulent?
147. Are you aware of any other financial institutions that employed ex-dividend trading strategies “where nothing came in from outside”?
148. Was your understanding that the trades in Danish shares that were part of Solo’s ex-dividend strategy were reported to the London Stock Exchange?
149. What was the basis for that understanding?